

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
15375 MEMORIAL CORPORATION, <i>et al.</i> ,	)	Bankr. Case No. 06-10859 (KG)
Debtors.	)	(Jointly Administered)
BEPCO, L.P., f/k/a Bass Enterprises Production Company	)	
Appellant,	)	Civil Action No. 08-313 (SLR)
v.	)	(Consolidation for procedural purposes of Civil Actions 08- 313, 08-314, 08-318, 08-319, 08- 321, 08-322, 08-325 & 08-326)
15375 MEMORIAL CORPORATION, <i>et al.</i>	)	
Appellees and Cross-Appellants.	)	<b>Re: Docket Item 12</b>

**NOTICE OF FILING OF D. DEL. L.R. 7.1.1 STATEMENT RELATING TO  
MOTION OF APPELLANT BEPCO, L.P., F/K/A BASS ENTERPRISES  
PRODUCTION COMPANY FOR LEAVE TO FILE A REPLY IN SUPPORT OF  
ITS EMERGENCY REQUEST FOR CERTIFICATION FOR DIRECT APPEAL  
TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

Appellant BEPCO, L.P., f/k/a Bass Enterprises Production Company (“BEPCO”), hereby files this statement relating to the *Motion of Appellant BEPCO, L.P., f/k/a Bass Enterprises Production Company for Leave to File A Reply In Support Of Its Emergency Request For Certification For Direct Appeal To The United States Court Of Appeals For The Third Circuit* (D.I. 12) (the “Motion”) in accordance with Rule 7.1.1. of the Local Rules of Civil Practice and Procedure for the United States District Court for the District of Delaware:

1. The undersigned counsel for BEPCO hereby avers that it has made reasonable efforts to reach agreement with counsel for appellee/cross-appellants Santa Fe Minerals, Inc. (“Santa Fe” or “SFMI”) and 15375 Memorial Corporation (“Memorial,” and

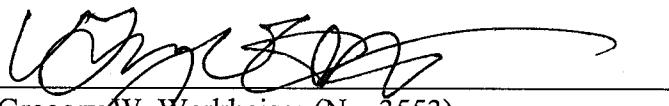
together with Santa Fe, the “Debtors”) and GlobalSantaFe Corporation, GlobalSantaFe Corporate Services, Inc. and Entities Holdings, Inc. (collectively, the “GSF Entities”) with respect to the Motion.

2. The Motion is procedural and relates to BEPCO’s request to expedite its appeals and certify them for direct review by the United States Court of Appeals for the Third Circuit (D.I. 6) (the “Certification Request”). Given the expedited nature of the Certification Request, BEPCO filed the Motion (together with its proposed reply in support of the Certification Request) on Monday, June 16, 2008, the first business day after the Debtors and GSF Entities had filed their respective objections to the Certification Request (D.I. 9 & 10).

3. On Tuesday, June 17, 2008, BEPCO requested that the Debtors and GSF Entities consent to the Motion. Neither the Debtors nor the GSF Entities have responded to BEPCO’s request to consent to the Motion.

Dated: Wilmington, Delaware  
June 18, 2008

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as Bass Enterprises Production Company

**CERTIFICATE OF SERVICE**

I, Gregory W. Werkheiser, certify that I am not less than 18 years of age, and that service of the **Notice Of Filing Of D. Del. L.R. 7.1.1 Statement Relating To Motion Of Appellant BEPCO, L.P., f/k/a Bass Enterprises Production Company For Leave To File A Reply In Support Of Its Emergency Request For Certification For Direct Appeal To The United States Court Of Appeals For The Third Circuit** was caused to be made on June 18, 2008, in the manner indicated upon the parties on the attached list.

Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: June 18, 2008



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Gregory W. Werkheiser (#3553)

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